

VHA Message Flow Infringements and Actions Required				
		Infringements	Severity	Actions Required
Subscription Request	Programme	Failure to send subscription request message 4.4.1	1	Send subscription request message, instructing customer to send MO message to shortcode
		Multiple subscription request messages resent 4.4.8	1	Resend <i>only one</i> subscription request message and <i>only</i> within <i>one</i> hour of first subscription request message sent
		Unapproved VHA endorsement or use of VHA name 4.4.1	1	Remove VHA endorsement or VHA name
		Misrepresentation of product offering 3.1.2	1	Display references to product type accurately, consistently, among all messages and ad
		Misrepresentation of product quantity 3.1.2	1	Display product quantity accurately, consistently, among all messages and ad
		No message quantity 4.4.1	1	Display actual message quantity for which customer will be billed per charge period
		Duplicate double opt-in keyword 4.4.6	1	Ensure double opt-in keyword is unique for shortcode and service
		Double opt-in keyword fails to express clear and positive intention to proceed 4.4.6	1	Ensure word used as double opt-in keyword is expression indicating clear and positive intention to proceed
		Double opt-in keyword displayed within insufficient proximity to pricing and subscription charge period 4.4.2	2	Display double opt-in keyword within sufficient proximity to pricing and subscription charge period, with no intervening text
		Subscription request message resent later than permissible 4.4.8	2	Resend <i>only one</i> subscription request message and <i>only</i> within <i>one</i> hour of first subscription request message sent
		Failure to preface subscription request message with "FreeMsg" 4.4.1	2	Preface all subscription request messages with "FreeMsg"
		Failure to identify service 4.4.1; 4.4.9	2	Display service name in message body or header
		Failure to identify service clearly 4.4.1; 4.4.9	3	Display service name in message body or header and consistently in all messages and ad
	Failure to disclose clearly duration of "free" period 3.1.14	3	State clearly duration of period during which service is delivered free of charge	
	Pricing	No pricing 4.4.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
		No mention of signup cost 4.4.1	1	Disclose signup cost
		Unclear pricing 4.4.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
		Conflicting pricing 4.4.1	1	Display pricing accurately, consistently, in prescribed format in all messages and ad: \$XX.XX
		Use of the term <i>free</i> , implying product comes without charge 3.1.14	2	Remove the term <i>free</i>
	Subscription	No subscription disclosure 4.4.3	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in subscription request or subscription confirmation message
		No subscription charge period 4.4.1	2	Display subscription charge period
		Unclear subscription charge period 4.4.1	2	Express subscription charge period per time interval such as day, week, or month
	T&Cs	No local-charge or free-call Helpline number 4.4.1	1	Display local-charge or free-call Helpline number
		Alphanumeric Helpline number 4.4.1	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
		No unsubscribe information 4.4.1	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Unclear unsubscribe information 4.4.1	2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Incorrect unsubscribe information 4.4.1	2	Display <i>STOP</i> as unsubscribe command
		Unsubscribe information positioned incorrectly 4.4.2	2	Display unsubscribe information <i>after</i> service name, pricing, charge period, and double opt-in keyword
		Helpline number positioned incorrectly 4.4.2	2	Display local-charge or free-call Helpline number <i>after</i> service name, pricing, charge period, and double opt-in keyword

VHA Message Flow Infringements and Actions Required <i>continued</i>				
		Infringements	Severity	Actions Required
Subscription Confirmation	Programme	Failure to send subscription confirmation message within one business day of receiving customer opt-in MO 4.4.4	1	Send subscription confirmation message within one business day of receiving customer opt-in MO
		Failure to require double opt-in 4.4.4b	1	Require customer to send MO message to shortcode before sending billed MT
		Failure to send subscription confirmation message before other service messages 4.4.4	1	Send subscription confirmation message before other subscription service messages
		Subscription confirmation message sent as paid message, without content 4.4.5	1	Include content with subscription confirmation message, if sent as paid message
		Subscription confirmation message sent as WAP push 4.3.4; 4.4.5	1	Send subscription confirmation message as standard SMS message only
		Unapproved VHA endorsement or use of VHA name 4.4.4	1	Remove VHA endorsement or VHA name
		Misrepresentation of product offering 3.1.2	1	Display references to product type accurately, consistently, among all messages and ad
		Misrepresentation of product quantity 3.1.2	1	Display product quantity accurately, consistently, among all messages and ad
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from subscription confirmation message
		Failure to identify service 4.4.9	2	Display service name in message body or header
	Failure to identify service clearly 4.4.9	3	Display service name in message body or header and consistently among all messages and ad	
Subscription	No subscription disclosure 4.4.3	1	Disclose subscription nature of offer at start of message by displaying word <i>subscribe</i> or <i>subscription</i> in subscription request or subscription confirmation message	
Non-subscription WAP Purchase Confirmation	Programme	Failure to send purchase confirmation message 4.3.2	1	Send purchase confirmation message, instructing customer to send MO message to shortcode
		Unapproved VHA endorsement or use of VHA name 4.3.2	1	Remove VHA endorsement or VHA name
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from purchase confirmation message
		Failure to preface purchase confirmation message with "FreeMsg" 4.3.2	2	Preface all purchase confirmation messages with "FreeMsg"
		Failure to identify service 4.3.2	2	Display service name
		Failure to identify service clearly 4.3.2	3	Display service name consistently in all messages and ad
		Multiple purchase confirmation messages 4.3.2	3	Refrain from sending more than one purchase confirmation message per customer request
	Pricing	No pricing 4.3.2	1	Display full, accurate pricing in prescribed format: \$XX.XX
		Unclear pricing 4.3.2	2	Display full, accurate pricing in prescribed format: \$XX.XX
		Conflicting pricing 4.3.2	2	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
		Use of the term <i>free</i> , implying product comes without charge 3.1.14	2	Remove the term <i>free</i>
T&Cs	No local-charge or free-call Helpline number 4.3.2	3	Display local-charge or free-call Helpline number	
	Alphanumeric Helpline number 4.3.2	3	Display local-charge or free-call Helpline number entirely in numerals (no letters)	

VHA Message Flow Infringements and Actions Required <i>continued</i>				
		Infringements	Severity	Actions Required
\$30 Expenditure Update	Programme	Failure to send \$30 expenditure update 4.3.4; 4.4.11	1	Send expenditure update each time customer incurs \$30 in mobile content fees during single calendar month
		\$30 expenditure update sent as WAP push 4.3.4; 4.4.11	1	Send \$30 expenditure updates as standard SMS message only
		Unapproved VHA endorsement or use of VHA name 4.3.5; 4.4.12	1	Remove VHA endorsement or VHA name
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from \$30 expenditure update
		Failure to preface expenditure update with "FreeMsg" 4.3.5; 4.4.12	2	Preface all expenditure updates with "FreeMsg"
		Failure to identify service 4.3.5; 4.4.12; 4.4.9	3	Display service name or shortcode in message body or header
		Failure to identify service clearly 4.3.5; 4.4.12; 4.4.9	3	Display service name in message body or header and consistently among all messages and ad
	Subscription	No subscription disclosure 4.4.12	1	Disclose subscription nature of offer
	T&Cs	No local-charge or free-call Helpline number [subscription services only] 4.4.12	1	Display local-charge or free-call Helpline number
		Alphanumeric Helpline number [subscription services only] 4.4.12	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
No unsubscribe information [subscription services only] 4.4.12		1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"	
Unclear unsubscribe information [subscription services only] 4.4.12		2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"	
Incorrect unsubscribe information [subscription services only] 4.4.12		2	Display <i>STOP</i> as unsubscribe command	
30-Day Reminder [subscription only]	Programme	Failure to send 30-day reminder 4.4.13	1	Send 30-day reminder to subscription customers who have not had occasion to receive \$30 expenditure update during single calendar month
		30-day reminder sent as WAP push 4.4.13	1	Send 30-day reminders as standard SMS message only
		Unapproved VHA endorsement or use of VHA name 4.4.14	1	Remove VHA endorsement or VHA name
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from 30-day reminder
		Failure to preface reminder with "FreeMsg" 4.4.14	2	Preface all reminders with "FreeMsg"
		Failure to identify service 4.4.14; 4.4.9	2	Display service name in message body or header
		Failure to identify service clearly 4.4.14; 4.4.9	3	Display service name in message body or header and consistently in all messages and ad
	Pricing	No pricing 4.4.14	1	Display full, accurate pricing in prescribed format: \$XX.XX
		Conflicting pricing 4.4.14	2	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
		Unclear pricing 4.4.14	3	Display full, accurate pricing in prescribed format: \$XX.XX
		Use of the term <i>free</i> , implying product comes without charge 3.1.14	3	Remove the term <i>free</i>
		Subscription	No subscription disclosure 4.4.14	1
	No subscription charge period 4.4.14		1	Display subscription charge period
	Unclear subscription charge period 4.4.14		2	Express subscription charge period per time interval such as day, week, or month

VHA Message Flow Infringements and Actions Required <i>continued</i>				
		<i>Infringements</i>	<i>Severity</i>	<i>Actions Required</i>
30-Day Reminder <i>cont.</i>	T&Cs	No local-charge or free-call Helpline number 4.4.14	1	Display local-charge or free-call Helpline number
		Alphanumeric Helpline number 4.4.14	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
		No unsubscribe information 4.4.14	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Unclear unsubscribe information 4.4.14	2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Incorrect unsubscribe information 4.4.14	2	Display <i>STOP</i> as unsubscribe command
Chat Warning	Programme	Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from chat warning message
		Failure to identify service [subscription services only] 3.1.2; 4.4.9	2	Display service name in message body or header
		Failure to send chat service warning message 4.1.8	3	Send chat service warning message alerting customer to potential dangers of disclosing personal details via chat
		Failure to preface chat service warning message with "FreeMsg" VHA rule	3	Preface all chat service warning messages with "FreeMsg"
		Failure to alert customer to potential dangers of disclosing personal details via chat 4.1.8	3	Express in chat warning message potential dangers of disclosing personal details via chat
		Failure to identify service clearly [subscription services only] 3.1.2; 4.4.9	3	Display service name in message body or header and consistently in all messages and ad
Chat Welcome [non-subscription only]	Programme	Failure to send chat service welcome message 4.3.6	1	Send chat service welcome message
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from chat welcome message
		Misrepresentation of product offering 3.1.2	1	Display references to product type accurately, consistently, among all messages and ad
		Misrepresentation of message quantity 3.1.2	1	Display actual message quantity for which customer will be billed per charge period
		Failure to identify service 4.3.6	2	Display service name
		Failure to identify service clearly 4.3.6	3	Display service name consistently in all messages and ad
		Failure to preface chat service welcome message with "FreeMsg" 4.3.6	3	Preface all chat service welcome messages with "FreeMsg"
	Pricing	No pricing 4.3.6	1	Display full, accurate pricing in prescribed format: \$XX.XX
		Unclear pricing 4.3.6	2	Display full, accurate pricing in prescribed format: \$XX.XX
		Conflicting pricing 4.3.6	2	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
		Use of the term <i>free</i> , implying product comes without charge 3.1.14	3	Remove the term <i>free</i>
	T&Cs	No local-charge or free-call Helpline number 4.3.6	1	Display local charge or free-call Helpline number
		Alphanumeric Helpline number 4.3.6	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
		No charge period 4.3.6	3	Display charge period
Unclear charge period 4.3.6		3	Express charge period per message or per message pair	
Paid [incl. chat]	Programme	Failure to preface paid message with "\$Msg" 5.2.8	1	Preface all paid messages with "\$Msg"
		Failure to identify service [subscription services only] 4.4.9	2	Display service name in message body or header
		Failure to identify service clearly [subscription services only] 4.4.9	3	Display service name in message body or header and consistently among all messages and ad

VHA Message Flow Infringements and Actions Required <i>continued</i>				
		Infringements	Severity	Actions Required
WAP Push Message	Programme	Failure to preface paid message with "\$Msg" [paid messages only] 5.2.8	1	Require customer to send MO message to shortcode before sending billed MT
		No local-charge or free-call Helpline number or shortcode 5.1.8	1	Display local-charge or free-call Helpline number or shortcode
		Local-charge or free-call Helpline number or shortcode positioned incorrectly 5.1.8	2	Display local-charge or free-call Helpline number or shortcode <i>before</i> WAP Website URL
		Failure to identify service [paid message subscription services only] 4.4.9	2	Display service name in message body or header
		Failure to identify service clearly [paid message subscription services only] 4.4.9	3	Display service name consistently among all messages (in both message body and header) and ad
Single Purch.	Programme	Failure to require customer opt-in 5.1.2	1	Require customer to send MO message to shortcode before sending billed MT
		Failure to preface paid message with "\$Msg" 5.2.8	1	Preface all paid messages with "\$Msg"
		Misrepresentation of billed message quantity	1	Ensure billed message quantity in message flow reflects billed message quantity in ad
Reverse Char.	Programme	Failure to require customer opt-in [MO-initiated services only] 5.1.2	1	Require customer to send MO message to shortcode before sending billed MT
		Failure to preface paid message with "\$Msg" 5.2.8	1	Preface all paid messages with "\$Msg"
		Multiple MT messages triggered by single charge 5.2.3	1	Send single MT message per charge to customer
Free Period	Programme	Failure to send message that "free" period is over 3.1.14	1	Send message notifying customer that "free" period is over and charges will commence
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from "free" period message
		Failure to preface "free" period message with "FreeMsg" 3.1.14	2	Preface all "free" period messages with "FreeMsg"
	T&Cs	No local-charge or free-call Helpline number 3.1.14	1	Display local-charge or free-call Helpline number
		Alphanumeric Helpline number 3.1.14	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
		No unsubscribe information 3.1.14	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Unclear unsubscribe information 3.1.14	2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Incorrect unsubscribe information 3.1.14	2	Display <i>STOP</i> as unsubscribe command
		Failure to disclose clearly duration of "free" period 3.1.14	3	State clearly duration of period during which service is delivered free of charge
		Charges and Billing	No mention of impending charges 3.1.14	2
Unclear impending charges 3.1.14	3		State amount of impending charges clearly in prescribed format: \$XX.XX	
Conflicting impending charges 3.1.14	3		Display impending charges accurately, consistently, in prescribed format: \$XX.XX	

VHA Message Flow Infringements and Actions Required <i>continued</i>				
		Infringements	Severity	Actions Required
Marketing	Programme	Unauthorised marketing message or messages 3.1.23	1	Refrain from sending marketing messages to customers who decline option or opt out
		Marketing message delivered via short code VHA rule - VHA PSMS Handbook, Section 3.6	1	Deliver all marketing messages via long code
		Marketing message received after unsubscribing from service VHA rule - VHA PSMS Handbook, Section 3.6	1	Discontinue all marketing messages when a subscription is terminated, and purge MSISDN from all marketing databases
		Message sender not identified 3.1.17	1	Identify message sender clearly and accurately in all marketing messages (identify content provider by name)
		No message sender contact details VHA rule - VHA PSMS Handbook, Section 3.4.1	1	Display local-charge or free-call Helpline number
		Unclear or inaccurate identification of message sender 3.1.17	1	Identify message sender clearly and accurately in all marketing messages (identify content provider by name)
		Unapproved VHA endorsement or use of VHA name 3.1.2	1	Remove VHA endorsement or VHA name
		Contains adult-related language or concepts 3.1.17	1	Remove adult-related language or concepts from all marketing messages
		Failure to preface marketing message with "FreeMsg" 3.1.17	2	Preface all marketing messages with "FreeMsg"
		Implies message is personal or suggests false imperative 3.1.17	2	Refrain from implying marketing message is personal or suggesting false imperative
		Multiple marketing messages sent per week 3.1.18	2	Refrain from sending more than one marketing message per week
	Pricing	No pricing 3.1.22	1	Display full, accurate pricing in prescribed format: \$XX.XX
		Use of the term <i>free</i> , implying product comes without charge 3.1.14	2	Remove the term <i>free</i>
	T&Cs	No unsubscribe information 3.1.17	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Unclear unsubscribe information 3.1.17		2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"	
Incorrect unsubscribe information 3.1.17		2	Display <i>STOP</i> as unsubscribe command	
Error	Programme	Failure to send error message 5.1.9; 5.1.10	1	Send message promptly informing customer that message has not been recognised
		Failure to preface error message with "FreeMsg" 5.1.9; 5.1.10	2	Preface all error messages with "FreeMsg"
		Failure to confirm error 5.1.9; 5.1.10	2	Inform customer message has not been recognised
		Failure to identify service clearly 5.1.9; 5.1.10	3	Display service name consistently in all messages and ad
		No local-charge or free-call Helpline number 5.1.9; 5.1.10	1	Display local-charge or free-call Helpline number
Unsubscribe Confirmation	Programme	Failure to respond within one business day to customer message to STOP service 7.2.5	1	Send message promptly informing customer that service has been terminated and that no more messages will be sent
		Customer STOP message not recognised 7.2.4	1	Treat as STOP request any message containing the word "stop"
		Unapproved VHA endorsement or use of VHA name 3.1.2	1	Remove VHA endorsement or VHA name
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from STOP message
		Failure to preface unsubscribe confirmation message with "FreeMsg" 7.2.6	2	Preface cancellation confirmation message with "FreeMsg"

VHA Message Flow Infringements and Actions Required <i>continued</i>				
		<i>Infringements</i>	<i>Severity</i>	<i>Actions Required</i>
<i>Unsub.</i>	<i>Programme</i> <i>continued</i>	Failure to confirm service termination 7.2.5	2	Inform customer that service has been terminated
		Failure to identify service 4.4.9; VHA rule	2	Display service name in message body or header
		Failure to identify service clearly 4.4.9; VHA rule	3	Display service name in message body or header and consistently in all messages and ad